

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

CHARLES WILSON,

Plaintiff,

-against-

CAPITOL RECORDS, INC. and EMI MUSIC, INC.  
d/b/a CAPITOL MUSIC GROUP, BERLIN  
CAMERON UNITED, HEINEKEN USA, INC.,

Defendants.

Case No. 07CV5449 (DC)(THK)

**NOTICE OF MOTION  
TO ADMIT COUNSEL  
PRO HAC VICE**

PLEASE TAKE NOTICE that, pursuant to Rule 1.3 of the Local Rules of the United States District Court for the Southern District of New York, and upon the annexed Declaration of Richard S. Mandel, Esq., a member in good standing of the bar of this Court, Defendants, their attorneys Cowan, Liebowitz & Latman, P.C., hereby move this Court for an Order allowing the *pro hac vice* admission of:

David A. Steinberg, Esq.  
Mitchell, Silberberg & Knupp LLP  
11377 West Olympic Boulevard  
Los Angeles, California 90064-1683  
Phone Number: (310) 312-2000  
Fax Number: (310) 312-3100  
Email: das@msk.com

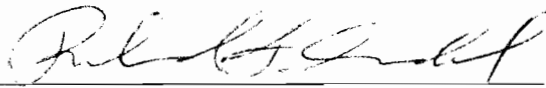
As evidenced by the annexed Certificate of Good Standing, David A. Steinberg is a member in good standing of the Bar of the State of California.

There are no pending disciplinary proceedings against David A. Steinberg in any State or Federal court.

Dated: New York, New York  
July 23, 2007

Respectfully submitted,

COWAN, LIEBOWITZ & LATMAN, P.C.  
Attorneys for Defendants

By: 

Richard S. Mandel (RM-4884)  
1133 Avenue of the Americas  
New York, New York 10036-6799  
Phone: (212) 790-9200  
Fax: (212) 575-0671

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

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CHARLES WILSON,	:	
	:	Case No. 07CV5449 (DC)(THK)
Plaintiff,	:	
	:	
-against-	:	<b>DECLARATION OF RICHARD</b>
	:	<b>S. MANDEL IN SUPPORT OF</b>
CAPITOL RECORDS, INC. and EMI MUSIC, INC.	:	<b>MOTION TO ADMIT COUNSEL</b>
d/b/a CAPITOL MUSIC GROUP, BERLIN	:	<b><u>PRO HAC VICE</u></b>
CAMERON UNITED, HEINEKEN USA, INC.,	:	
	:	
Defendants.	:	
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RICHARD S. MANDEL, pursuant to 28 U.S.C. § 1746, declares as follows:

1. I am a member of the law firm of Cowan, Liebowitz & Latman, P.C., counsel for Defendants in the above-captioned action. I submit this declaration in support of Defendants' motion to admit David A. Steinberg as counsel *pro hac vice* to represent Defendants in this matter.


2. I am a member in good standing of the Bar of the State of New York, and was admitted to practice law in 1986. I am also admitted to the Bar of the United States District Court for the Southern District of New York, and am in good standing with this Court.

3. Mr. Steinberg is a partner, through his professional corporation, at Mitchell, Silberberg & Knupp LLP in Los Angeles, California, which has represented defendant Capitol Records, Inc. for many years. Mr. Steinberg is experienced in federal practice and is familiar with the Federal Rules of Civil Procedure. Annexed hereto is a Certificate of Good Standing for Mr. Steinberg from the Bar of the State of California.

4. Accordingly, I am pleased to move for the admission *pro hac vice* of David A. Steinberg. I respectfully submit the annexed proposed order granting the admission *pro hac vice* of David A. Steinberg.

WHEREFORE it is respectfully requested that the motion to admit David A. Steinberg, *pro hac vice*, to represent Defendants in the above-captioned matter, be granted.

I DECLARE UNDER PENALTY OF PERJURY THAT THE FOREGOING IS TRUE AND CORRECT. EXECUTED ON July 23, 2007 AT NEW YORK, NEW YORK.

A handwritten signature in cursive script, appearing to read 'Richard S. Mandel', written in black ink over a horizontal line.

RICHARD S. MANDEL



THE  
STATE BAR  
OF CALIFORNIA

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180 HOWARD STREET  
SAN FRANCISCO, CALIFORNIA 94105-1639  
TELEPHONE (415) 538-2000

July 16, 2007

TO WHOM IT MAY CONCERN:

This is to certify that according to the records of the State Bar, DAVID ALAN STEINBERG, #130593 was admitted to the practice of law in this state by the Supreme Court of California on December 14, 1987; and has been since that date, and is at date hereof, an ACTIVE member of the State Bar of California; and that no recommendation for discipline for professional or other misconduct has ever been made by the Board of Governors or a Disciplinary Board to the Supreme Court of the State of California.

THE STATE BAR OF CALIFORNIA

Kath Lambert  
Custodian of Membership Records

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

-----	x	
CHARLES WILSON,	:	
	:	
Plaintiff,	:	Case No. 07CV5449 (DC)(THK)
	:	
-against-	:	
CAPITOL RECORDS, INC. and EMI MUSIC, INC.	:	<b>[PROPOSED] ORDER FOR</b>
d/b/a CAPITOL MUSIC GROUP, BERLIN	:	<b><u>ADMISSION PRO HAC VICE</u></b>
CAMERON UNITED, HEINEKEN USA, INC.,	:	
	:	
Defendants.	:	

----- x

This matter having come before the Court on the motion of Richard S. Mandel, Esq., attorney for defendants and a member in good standing of the bar of this Court, and said sponsor attorney's declaration in support of the motion, for leave to permit David A. Steinberg, Esq. to appear in this action *pro hac vice* as counsel for Defendants;

IT IS HEREBY ORDERED that:

David A. Steinberg, Esq.  
11377 West Olympic Boulevard  
Los Angeles, California 90064-1683  
Phone Number: (310) 312-2000  
Fax Number: (310) 312-3100  
Email: das@msk.com

is admitted to practice *pro hac vice* as counsel for Defendants in the above-captioned case in the United States District Court for the Southern District of New York. All attorneys appearing before this Court are subject to the Local Rules of this Court, including the rules governing discipline of attorneys. If this action is assigned to the Electronic Case Filing System (ECF), counsel shall immediately apply for an ECF password at [nysd.uscourts.gov](http://nysd.uscourts.gov). Counsel shall forward the *pro hac vice* fee to the Clerk of the Court.

Dated: \_\_\_\_\_, 2007

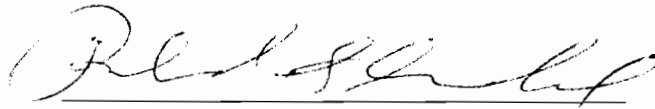
\_\_\_\_\_  
UNITED STATES DISTRICT JUDGE

**CERTIFICATE OF SERVICE**

I, Richard S. Mandel, being a member of the Bar of this Court, certify that on July 23, 2007, I caused a true copy of the foregoing *Notice of Motion for the Pro Hac Vice Admission of David A. Steinberg* and supporting papers, to be served on plaintiff's counsel by First Class Mail addressed to:

Helene M. Freeman, Esq.  
Dorsey & Whitney, LLP  
250 Park Avenue  
New York, New York 10177

Dated: New York, New York  
July 23, 2007

A handwritten signature in cursive script, appearing to read 'Richard S. Mandel', written over a horizontal line.

RICHARD S. MANDEL